

This document was submitted to EPA by a registrant in connection with EPA's evaluation of this chemical, and it is presented here exactly as submitted.

7 June 1999

Public Information and Records Integrity Branch  
Information Resources and Services Division (7502C)  
Office of Pesticide Programs  
**Environmental Protection Agency**  
Crystal Mall #2, room 119  
1921 Jefferson Davis Highway  
Arlington, Virginia 22202

Dear Sir or Madam:

**RE: Tetrachlorvinphos HED Human Health Risk Assessment  
Chemical ID No. 083701, List A Reregistration Case No. 0321**

On 12 March 1999, The Hartz Mountain Corporation submitted to the EPA a response to the 60-day comment period for the referenced Preliminary Risk Assessment as issued in the Federal Register on 15 January 1999. That response, which sought to address various human exposure data gaps, included several new human exposure studies, an interim dislodgeability study, and several protocols for pending new studies. It also included revised assessments based on the data being submitted, along with a commitment to provide additional data upon completion of the pending studies.

On 5 May 1999, various Hartz representatives and consultants met with EPA representatives to discuss the March submission and the pending studies and to evaluate how this data can (1) be used to replace many of the Agency's default assumptions and (2) be made available for use in future risk assessments for pesticidal products for use on pet animals.

The pending studies have now been completed and are being submitted as part of this response. The revised risk assessments submitted in March have been updated to include this new information. In addition, the studies included in the March 1999 submission have been expanded to respond to various questions raised during the May meeting. Therefore, this submission completely supersedes our 12 March 1999 submission. (Please note that this entire submission is being presented without any claims of confidentiality in order to allow the Agency to make use of any of the newly developed protocols and procedures in future risk assessments.) We believe that the revised assessments submitted herewith will help demonstrate to the Agency that the residential exposure from use of this chemical is well below the Agency's limits of concern and that the products do not pose unacceptable risks to users or their families.

**Tetrachlorvinphos HED Human Health Risk Assessment**  
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As per the instructions published in the Federal Register document, three (3) copies of this information are being submitted to the Public Information and Records Integrity Branch. A disk containing the narrative (Word Perfect) and tables (Excel) is also included. In addition, the narrative and tables are being sent via e-mail to Demson Fuller, the project leader for the risk assessment of this chemical.

Sincerely,

Pat Bieler, Director  
Government Relations

cc: D. Fuller - EPA  
W. Perlberg  
R. Devine  
C. Chaisson  
P. Price